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June 1, 2023

VIA CM/ECF

Honorable James B. Clark, III
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

RE: *Matthew Donohue v. Capella University, LLC, et al.*
Case No. 2:22-cv-5634 (CCC) (JBC)

Dear Judge Clark,

I represent the Plaintiff in the above-referenced matter. In accordance with Your Honor's February 16, 2023 Pretrial Scheduling Order, the parties jointly submit this status letter itemizing the issues counsel would like to discuss at the June 7, 2023 telephone status conference.

1. Dispute Concerning Whether or Not to Issue a Discovery Confidentiality Order

Per Defendant's letter to the Court dated May 17, 2023, Defendants desire to have a Discovery Confidentiality Order entered in this matter.

Per Plaintiff's response letter dated May 24, 2023, Plaintiff does not believe a Discovery Confidentiality Order is appropriate or necessary in this case.

2. Request to Stay Discovery

Plaintiff requests that the Court stay all discovery on this matter until the Court rules on the pending Motion to Dismiss to limit the possibility of unnecessary attorney expenses/time spent on the preparation of discovery requests and responses.

With respect to the current status of discovery, Defendants served their initial written discovery requests on May 11, 2023. Plaintiff has not yet served his initial

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discovery requests, but Defendants have consented to an extension to June 10, 2023 for him to do so.

Respectfully,

THE LAW OFFICE OF KEITH ALTMAN


Keith Altman, Esq.

cc (via CM/ECF):

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